

REMARKS

The present application has been reviewed in light of the Office Action dated August 4, 2009. Claims 1-17 are presented for examination, of which Claims 1, 9, and 17 are in independent form. Without conceding the propriety of the rejections, Claims 1, 9, and 17 have been amended to define Applicants' invention more clearly. Favorable reconsideration is requested.

The Office Action states that Claims 1, 2, 4, 7-10, 12, and 15-17 are rejected under § 103(a) as being unpatentable over U.S. Patent No. 5,798,508 (Walker et al.), in view of U.S. Patent No. 5,999,938 (Bliss et al.), in view of U.S. Patent No. 5,941,654 (Kalajan), in view of U.S. Patent No. 7,409,405 (Masinter et al.), and further in view of U.S. Patent Application Publication No. 2004/0255287 (Zhang et al.); that Claims 3 and 11 are rejected under § 103(a) as being unpatentable over Walker et al., in view of Bliss et al., in view of Kalajan, in view of Masinter et al., in view of Zhang et al., and further in view of U.S. Patent No. 7,165,239 (Hejlsberg et al.); and that Claims 5, 6, 13, and 14 are rejected under § 103(a) as being unpatentable over Walker et al., in view of Bliss et al., in view of Kalajan, in view of Masinter et al., in view of Zhang et al., and further in view of U.S. Patent Application Publication No. 2003/0195762 (Gleason et al.). Applicants submit that independent Claims 1, 9, and 17, together with the claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

Among other notable features of Claim 1 is "a proxy application coupled between the seller application and the supplier application, wherein the proxy application is configured to ... ensure that a receiver or a sender of the message cannot dispute having received or sent the message." This non-repudiation service helps reduce fraud and diagnose problems if one party

claims to have not transmitted or received a particular message. *See* paragraph [0026] of the originally filed specification.

Walker et al. relates to a system and method for issuing and clearing traveler's checks that are paid for by credit card. As noted by the Office Action on page 3, Walker et al. fails to teach or suggest a proxy application coupled between a seller application and a supplier application. Therefore, Walker et al. fails to teach or suggest at least a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

Bliss et al. relates to a system and method for creating a new data structure in memory populated with data from an existing data structure. Bliss et al. discloses that data from more than one source data structure can be used to create and populate a destination data structure without having to manually re-enter the data from each of the source data structures. However, nothing has been found in Bliss et al. to teach or suggest at least a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

Kalajan relates to a method for redirecting communication on a network between a client and a network resource. Kalajan discloses message redirection application 20 which reroutes messages between general purpose application 24 and network resource 14. A corresponding proxy application is located at the network resource 14 end. The corresponding proxy application can decrypt incoming messages and encrypt returning messages destined to client 10. Nothing has been found in Kalajan, however, to teach or suggest at least a proxy

application coupled between a seller application and a supplier application, wherein the proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

Masinter et al. relates to a file dispatcher for multiple application targets.

Masinter et al. discloses a proxy converter that can change a file type of a file to a file type that can be opened by an application that is installed on a computer system. Masinter et al., however, also fails to teach or suggest at least a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

Finally, Zhang et al. relates to a method and apparatus for updating inter-server communication software. Zhang et al. discloses a software update proxy function program that preferably functions between a UDP layer and an application process of a server within in a multi-server communication system. Zhang et al., however, also fails to teach or suggest at least a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

The remaining art of record has failed to reveal anything which, in Applicants' view, would remedy the above-noted deficiencies of Walker et al., Bliss et al., Kalajan, Masinter et al., and Zhang et al. as applied against the independent claims herein. According, Applicants submit that Walker et al., Bliss et al., Kalajan, Masinter et al., Zhang et al., Hejlsberg et al., and Gleason et al., whether taken individually or in combination, fail to teach or suggest at least a proxy application coupled between a seller application and a supplier application, wherein the

proxy application is configured to ensure that a receiver or a sender of a message cannot dispute having received or sent the message, as recited in independent Claim 1.

Accordingly, Applicants submit that Claim 1 is patentable over the cited art, and respectfully request withdrawal of the rejections under 35 U.S.C. § 103(a). Independent Claims 9 and 17 include a feature similar to that discussed above in connection with independent Claim 1. Therefore, Claims 9 and 17 are also believed to be patentable for at least the same reasons as discussed above.

The other rejected claims in this application depend from one or another of the independent claims discussed above and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

No petition to extend the time for response to the Office Action is deemed necessary for this Amendment. If, however, such a petition is required to make this Amendment timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 50-3939.

Applicants' undersigned attorney may be reached in our Washington, D.C. Office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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